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6 Attorneys for Defendant
K12 SERVICES, INC.

7
8 UNITED STATES DISTRICT COURT
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10 NORTHERN DISTRICT OF CALIFORNIA – OAKLAND DIVISION

11 DAVID ANDREW EHRENFELD, an
12 individual,

13 Plaintiff,

14 v.

15 K12 SERVICES, INC., a Delaware
16 corporation,

17 Defendant.
18

Case No. 4:13-cv-05075-DMR

**DECLARATION OF ALKA
RAMCHANDANI IN SUPPORT OF
DEFENDANT K12 SERVICES, INC.’S
CASE STATUS LETTER**

Complaint Filed: October 30, 2013

19 I, Alka Ramchandani, declare:

20 1. I am an attorney licensed to practice law in the State of California and admitted to
21 appear before this Court. I am an attorney with the law firm of Jackson Lewis P.C., attorneys of
22 record in this matter for Defendant K12 SERVICES, INC. (“Defendant”). I have personal
23 knowledge of the matters stated herein, and if called to testify as to these matters, I could and
24 would do so competently.

25 2. On October 22, 2015, I contacted Plaintiff’s counsel in this matter, Stephen Jaffe
26 to meet and confer regarding a joint case status letter as order by this Court. [Docket No. 14.]
27 Plaintiff’s counsel requested that I draft a proposed case status letter and provide it to him for his
28 approval.

3. I informed Plaintiff's counsel that I would get it to him by Saturday, October 24, 2015. On October 24, 2015, I was traveling and had difficulty sending Mr. Jaffe a draft of the case statement.

4. On Sunday October 25, 2015, I sent a proposed draft to Mr. Jaffe. That evening Mr. Jaffe requested that I provide him with my contact number. I provide him with my contact information.

5. On the evening of October 25, 2015, Mr. Jaffe and I spoke and he said that he disagrees with nearly our entire proposed joint letter and for these reasons he wanted to file our statements separately. I offered to combine our two statements in one document by separating our positions with the separate headings: Plaintiff's position and Defendant's position.

6. Mr. Jaffe said he did not want to have a combined case statement document because he thought our position was incorrect as he disagreed that the Arbitrator intended his ruling to be an interim arbitration. He also stated he believed our inclusion of citations, made our status letter a brief. He further said that he objected to our request for a scheduling order to move for attorney fees because he thought our request was premature and that he disagrees that we have grounds to file for attorney fees because we cannot show “bad faith.”

7. I told him I disagree with his position and that if he chose to file Plaintiff's status letter on his own, he ought to do so. I also told him having an argument over the phone about the issues would not resolve the matter and we should leave the decisions to the Judge and Arbitrator. He then stated he would file Plaintiff's case status letter that night.

I declare under penalty of perjury, under the laws of the United States, that the foregoing is true and correct.

Executed this 26th day of October, 2015, in San Francisco, California.

/s/
Alka Ramchandani